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13 *Attorneys for Plaintiff*

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15 **UNITED STATES DISTRICT COURT**

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17 **DISTRICT OF NEVADA**

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19 CHRISTOPHER LAMPKIN,  
20 Plaintiff,  
21 vs.  
22 UNITED STATES OF AMERICA ex rel  
23 UNITED STATES POSTAL SERVICE,  
24 Defendant.

25 Case No.: 2:23-cv-00301-RFB-VCF

26 **STIPULATION AND ORDER TO HOLD  
EXPERT DISCLOSURE DEADLINE IN  
ABEYANCE PENDING COURT  
DECISION ON DEFENDANT'S MOTION  
TO EXTEND [ECF NO. 23]**

27 **(First Request)**

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29 IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their respective  
30 attorneys, as follows:

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32 The current discovery plan and scheduling order [ECF No. 20] outlines the current deadlines:

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- 34 • Discovery cut-off date: November 27, 2023  
35 • Amending the Pleadings and Adding Parties: August 29, 2023  
36 • Expert Disclosures: September 28, 2023  
37 • Rebuttal Expert Disclosures: October 30, 2023  
38 • Dispositive Motions: December 27, 2023  
39 • Pretrial Order: January 26, 2024

1       On September 20, 2023, defendant filed its motion to extend discovery deadlines by 90 days  
2 [ECF No. 23]. Plaintiff filed a response to defendant's motion on September 26, 2023 [ECF No. 25].  
3 The hearing on defendant's motion is scheduled for October 2, 2023.

4       The Expert Disclosure deadline is currently September 28, 2023, prior to the October 2, 2023  
5 hearing. This presents a timing and fairness problem such that if plaintiff makes his expert disclosures  
6 on September 28, 2023 (which plaintiff is fully prepared to do), and the Court later grants defendant's  
7 motion on October 2, 2023 (which plaintiff has opposed), plaintiff will be prejudiced as defendant  
8 will have the unfair advantage of having plaintiff's expert disclosures in advance of making its own  
9 Expert Disclosures.

10      Accordingly, to prevent any prejudice or unfair advantages, the parties hereby stipulate that  
11 the current Expert Disclosure deadline of September 28, 2023, be held in abeyance for four calendar  
12 days until October 2, 2023, which is the date set for the hearing on defendant's motion to extend [ECF  
13 No. 23].

14      DATED this 27th day of September 2023.

15      DATED this 27th day of September 2023.

16      **MAIER GUTIERREZ & ASSOCIATES**

17      **AUSA, CIVIL DIVISION**

18      */s/ Jason R. Maier*

19      */s/ Skyler H. Pearson*

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27      SKYLER H. PEARSON, ESQ.  
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31      Attorneys for Defendant

32      IT IS SO ORDERED.

33        
34      **UNITED STATES MAGISTRATE JUDGE**

35      DATED: 9-27-2023